1 2	JAMES J. PISANELLI Nevada Bar No. 4027 TODD L. BICE Nevada Bar No. 4534	
3	DEBRA L. SPINELLI	
4	Nevada Bar No. 9695 PISANELLI BICE PLLC	
5	400 South 7th Street, Suite 300 Las Vegas, NV 89101	
	Telephone: 702/214-2100	
6	Facsimile: 702/214-2101	
7	BRAD D. BRIAN (pro hac vice forthcoming)	
8	MICHAEL R. DOYEN (pro hac vice forthcoming)	
9	DANIEL B. LEVIN	
10	(pro hac vice forthcoming) BETHANY W. KRISTOVICH	
11	(pro hac vice forthcoming) MUNGER, TOLLES & OLSON LLP	
	350 South Grand Avenue	
12	Fiftieth Floor Los Angeles, California 90071-3426	
13	Telephone: (213) 683-9100 Facsimile: (213) 687-3702	
14	` ,	
15	Attorneys for Defendants MANDALAY BAY, I MANDALAY CORP., MANDALAY RESORT	LC,
16	GROUP, MGM RESORTS FESTIVAL GROUN LLC, MGM RESORTS VENUE MANAGEMEN	
	LLC, AND MGM RESORTS INTERNATIONA	
17		
18	UNITED STATES	DISTRICT COURT
19	DISTRICT	OF NEVADA
20	RACHEL SHEPPARD an Individual, LOTUS	Case No. 2:18-cv-01120-RFB-VCF
$_{21}$	HERRERA an Individual and as Special Administrator of the Estate of BRIAN	NOTICE OF FILING NOTICE OF
$_{22}$	FRASER, decedent; STEPHANIE FRASER as the Guardian Ad Litem for AUBREE	REMOVAL OF ACTION WITH STATE COURT BY DEFENDANTS
	FRASER, a minor; STEPHANIE FRASER as	
23	the Guardian Ad Litem for BRAYDEN FRASER; JOVANNA CALZADADILLAS an	
24	Individual; FRANCISCO CALZADILLAS an Individual; NICHOLAS ROBONE an	
25	Individual; ANTHONY ROBONE an	
26	Individual,	
27	Plaintiffs,	
28	VS.	
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NOTICE OF FILING NOTICE OF REMOVAL WITH STATE COURT BY DEFENDANTS

1 2 3 4 5 6	MANDALAY BAY, LLC, f/k/a MANDALAY CORP., a Nevada Domestic Limited-Liability Company; MANDALAY RESORT GROUP, a Nevada Corporation; MGM RESORTS FESTIVAL GROUNDS, LLC, a Nevada Domestic Limited-Liability Company; MGM RESORTS VENUE MANAGEMENT, LLC, a Nevada Domestic Limited-Liability Company; MGM RESORTS INTERNATIONAL, a Delaware Corporation; DOES/ROES 1 through 100,
7	Defendants.
8	
9	TO THE COURT, ALL PARTIES, AND ATTORNEYS OF RECORD:
10	PLEASE TAKE NOTICE that Defendants filed notice on June 22, 2018 in the
11	Eighth Judicial District Court of Clark County, Nevada that Defendants have removed this action
12	from the Eighth Judicial District Court to the United States District Court for the District of
13	Nevada. A true and correct copy of the notice and proof of service is attached hereto as Exhibit 1.
14 15	DATED: June 25, 2018
16	PISANELLI BICE PLLC
17	
	By /s/ James J. Pisanelli
18	JAMES J. PISANELLI, Bar No. 4027
19	TODD L. BICE, Bar No. 4534 DEBRA L. SPINELLI, Bar No. 9695
20	400 South 7th Street, Suite 300
21	Las Vegas, NV 89101
22	Attorneys for Defendants MANDALAY BAY, LLC, MANDALAY CORP., MANDALAY
23	RESORT GROUP, MGM RESORTS FESTIVAL GROUNDS, LLC, MGM RESORTS VENUE
24	MANAGEMENT, LLC, AND MGM RESORTS INTERNATIONAL
25	
26	
27	
28	
	39121460.1 -2- NOTICE OF FILING NOTICE OF REMOVAL WITH STATE COURT BY DEFENDANTS

1	<u>CERTIFICATE OF SERVICE</u>	
2	I HEREBY CERTIFY that I am an employee of Pisanelli Bice PLLC, and that on this 25t	
3	day of June, 2018, I caused to be e-filed/e-served through the Court's website true and correct	
4	copies of the above and foregoing NOTICE OF FILING NOTICE OF REMOVAL OF	
5	ACTION IN STATE COURT BY DEFENDANTS properly addressed to the following:	
6	Mark P. Robinson, Jr.	
7	Daniel S. Robinson ROBINSON CALCAGNIE, INC. 19 Corporate Plaza Drive Newport Beach, CA 92660	
9	Robert T. Eglet Robert M. Adams Richard K. Hy	
11	EGLET PRINCE 400 South Seventh Street, Suite 400	
12	Las Vegas, NV 89101	
13	Kevin R. Boyle Rahul Ravipudi	
14	Gregorio V. Silva Ellin Mardirosian	
PANISH SHEA & BOYLE LLP 8816 Spanish Ridge Avenue Las Vegas, NV 89148	8816 Spanish Ridge Avenue	
16	Patrick McGroder III	
17	GALLAGHER & KENNEDY 2575 East Camelback Road	
18		
19	James Lee LEE MURPHY LAW FIRM	
20	440 Louisiana Street, #300 Houston, TX 77002	
21	/s/ Kimberly Peets	
22	An employee of Pisanelli Bice PLLC	
23		
24		
25		
26		
27		
28		
	30121/60 1	

NOTICE OF FILING NOTICE OF REMOVAL WITH STATE COURT BY DEFENDANTS